

**Exhibit 6D**

**Excerpts of July 14, 2014 R. Cline Deposition Transcript**

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1	IN THE UNITED STATES BANKRUPTCY COURT	1	For Creditor National Public Finance Guarantee Corp
2	FOR THE EASTERN DISTRICT OF MICHIGAN	2	
3		3	JEFFREY S. BEELAERT, ESQ.
4		4	SIDLEY AUSTIN, LLP
5		5	1501 K Street, N.W.
6	In Re: ) Chapter 9	6	Washington D.C. 20005
7	CITY of DETROIT, MICHIGAN, ) Case No. 13-53846	7	For Creditor Financial Guaranty Insurance Company:
8	Debtor. ) Hon. Steven Rhodes	8	PRAVIN R. PATEL, ESQ.
9	_____	9	WEIL GOTSHAL & MANGES, LLP
10		10	1395 Brickell Avenue
11		11	Suite 1200
12	The Videotaped Deposition of ROBERT CLINE,	12	Miami, Florida 33131
13	Taken at Jones Day	13	Also Appearing:
14	51 Louisiana Avenue, NW	14	Jonathan Perry, Videographer
15	Washington, DC	15	Marguerette Hosbach, Ernst & Young, via telephone
16	Commencing at 9:05 a.m.	16	
17	Monday July 14, 2014,	17	
18	Before Marjorie Peters, RMR, CRR	18	
19		19	
20		20	
21		21	
22		22	
23		23	
24		24	
25		25	
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1	APPEARANCES:	1	I N D E X
2	For the Debtor City of Detroit and the witness:	2	WITNESS
3	GEOFFREY S. STEWART, ESQ.,	3	Robert Cline
4	SARAH A. HUNGER, ESQ.,	4	
5	CHRISTOPHER DIPOMPEO, ESQ.	5	EXHIBITS
6	JONES DAY	6	Exhibit No. 1
7	51 Louisiana Avenue, N.W.	7	Exhibit No. 2
8	Washington, D.C. 20001-2113	8	Exhibit No. 3
9	For the Official Committee of Retirees:	9	Exhibit No. 4
10	DAN BARNOWSKI, ESQ.	10	Exhibit No. 5
11	DENTONS US, LLP	11	Exhibit No. 6
12	1301 K Street, N.W.	12	Exhibit No. 7
13	Suite 600, East Tower	13	Exhibit No. 8
14	Washington, D.C. 20005-3364	14	Exhibit No. 9
15	For Syncora Guarantee, Inc., and Syncora Capital	15	
16	Assurance, Inc.	16	
17	DOUGLAS G. SMITH, P.C.	17	
18	KIRKLAND & ELLIS, LLP	18	
19	300 North LaSalle	19	
20	Chicago, Illinois 60654	20	
21	For Creditor Assured Guaranty:	21	
22	LISA SCHAPIRA, ESQ.	22	
23	CHADBOURNE & PARKE, LLP	23	
24	30 Rockefeller Plaza	24	
25	New York, New York 10112	25	

Pages 1 to 4

Elisa Dreier Reporting Corp. (212) 557-5558  
950 Third Avenue, New York, NY 10022

1 R. CLINE  
 2 THE VIDEOGRAPHER: This is disk number one  
 3 of the video deposition of Robert Cline taken in  
 4 the matter of the City of Detroit, Michigan in the  
 5 U.S. Bankruptcy Court for the Eastern District of  
 6 Michigan. Chapter 9, Case No. 13-53846.  
 7 We are at the offices of Jones Day, 51  
 8 Louisiana Avenue Northwest, Washington, D.C. The  
 9 time is approximately 9:04 a.m. The date is July  
 10 14th, 2014. The court reporter is Marjorie Peters  
 11 and the videographer is Jonathan Perry, both here  
 12 on behalf of Elisa Dreier Reporting Company.  
 13 Would counsel please introduce yourselves  
 14 and state whom you represent.  
 15 MR. SMITH: Doug Smith for Syncora.  
 16 MR. STEWART: Geoffrey Stewart and Sarah  
 17 Hunger of Jones Day for the City of Detroit and for  
 18 the witness.  
 19 MS. SCHAPIRA: Lisa Schapira from  
 20 Chadbourne & Parke for Assured Guaranty.  
 21 MR. BEELAERT: Jeff Beelaert from Sidley  
 22 Austin for National.  
 23 MR. PATEL: Pravin R. Patel from Weil  
 24 Gotshal & Manges representing Financial Guaranty  
 25 Insurance Company.

1 R. CLINE  
 2 THE VIDEOGRAPHER: And would the reporter  
 3 swear in the witness, please.  
 4 ROBERT CLINE,  
 5 a witness, having been first duly sworn, was examined and  
 6 testified as follows:  
 7 BY MR. SMITH:  
 8 Q. Good morning, Mr. Cline. You have been  
 9 deposed before; is that correct, or not?  
 10 A. I have testified in a court case before.  
 11 Q. Okay. Have you ever given a deposition?  
 12 A. I don't remember. I have prepared reports. I  
 13 don't remember whether I actually participated in this  
 14 type of deposition.  
 15 Q. Okay. I'll be asking you a series of  
 16 questions, and you will let me know if you don't  
 17 understand any of my questions?  
 18 A. I will.  
 19 Q. Okay. And feel free to take a break whenever  
 20 you need to, okay?  
 21 A. All right.  
 22 Q. The report you filed, your report in this  
 23 matter, you're acting as an expert in tax policy; is that  
 24 correct?  
 25 A. My responsibility in this project was to do

1 R. CLINE  
 2 revenue estimates for the City of Detroit.  
 3 Q. Okay. And what is your area of expertise?  
 4 A. For my professional career, I've worked in  
 5 public finance, the economic aspects of public finance.  
 6 Q. Okay. So, you would be an expert in public  
 7 finance and the economic aspects of public finance; is  
 8 that correct?  
 9 A. My professional career has been doing state  
 10 tax work, whether it's revenue estimating, tax bill  
 11 analysis or forecasting.  
 12 Q. Okay. You wouldn't hold yourself out as an  
 13 expert in urban policy, correct?  
 14 A. I would not.  
 15 Q. And you wouldn't hold yourself as an expert on  
 16 health benefits?  
 17 A. I would not.  
 18 Q. You're not an expert on government in general?  
 19 A. I'm not.  
 20 Q. You're not an expert on blight reduction?  
 21 A. No, I'm not.  
 22 Q. Not an expert on art valuation?  
 23 A. No.  
 24 Q. Not an expert on pensions?  
 25 A. No.

1 R. CLINE  
 2 Q. Not an expert on government grants?  
 3 A. No.  
 4 Q. Do you hold yourself out as an expert on  
 5 casinos or wagering revenue?  
 6 A. I do not.  
 7 Q. Do you hold yourself out as an expert on state  
 8 revenue sharing?  
 9 A. I've studied state revenue sharing.  
 10 Q. In what context?  
 11 A. The State of Michigan, I was responsible for  
 12 various revenue estimates.  
 13 Q. And other than that, do you have any  
 14 experience with state revenue sharing?  
 15 A. I do not.  
 16 Q. You're not an expert on Detroit's government,  
 17 correct?  
 18 A. I am not.  
 19 Q. Not an expert on information technology?  
 20 A. No.  
 21 Q. Not an expert on transportation systems.  
 22 A. No.  
 23 Q. Have you ever done forecasting for a city?  
 24 A. I have not done forecasting for a city.  
 25 Q. And you're not an expert in accounting, are

<p style="text-align: right;">Page 9</p> <p>1 R. CLINE  2 you?  3 <b>A. I am not.</b>  4 Q. You're not an expert on Chapter 9  5 bankruptcies?  6 <b>A. No, I'm not.</b>  7 Q. You're not a restructuring expert, correct?  8 <b>A. No.</b>  9 Q. You're not holding yourself out as a legal  10 expert, correct?  11 <b>A. No, I'm not.</b>  12 Q. And you're not a lawyer, correct?  13 <b>A. I am not.</b>  14 Q. Have you ever done a tax forecast for a  15 wagering tax before?  16 <b>A. No, I have not.</b>  17 Q. And have you ever done a tax forecast for a  18 corporate tax?  19 <b>A. I have for the State of Michigan, and I did</b>  20 <b>for the State of Minnesota.</b>  21 Q. Okay. But in the context of corporate tax  22 revenues to a city, you haven't done a forecast?  23 <b>A. I have not.</b>  24 Q. You haven't done a municipal income tax  25 forecast before, have you?</p>	<p style="text-align: right;">Page 11</p> <p>1 <b>R. CLINE</b>  2 <b>that. I don't recall.</b>  3 Q. Okay. But sitting here today, you can't  4 identify any forecasts you ever did that was longer than  5 six years?  6 <b>A. I do not remember one.</b>  7 Q. And I mean, just to get -- make the record  8 clear, the standard forecast for purposes of tax  9 forecasting in Michigan state was four years; is that  10 correct?  11 <b>A. I believe it is. The budget cycle would be</b>  12 <b>either two years or four years of forecasts.</b>  13 Q. Okay. So, the standard forecast length in  14 Michigan and the accepted forecast length for tax  15 forecasting is either two or four years; correct?  16 <b>A. Correct.</b>  17 Q. And you previously worked as an expert in one  18 case; is that correct?  19 <b>A. I did.</b>  20 Q. And is that the only case you worked as an  21 expert?  22 <b>A. As I can recall, that was the only case where</b>  23 <b>I testified as an expert.</b>  24 Q. And when you testified as an expert, it wasn't  25 in forecasting, correct?</p>
<p style="text-align: right;">Page 10</p> <p>1 R. CLINE  2 <b>A. I have not.</b>  3 Q. You haven't done a municipal property tax  4 forecast, have you?  5 <b>A. I have not.</b>  6 Q. Have you ever done a tax forecast over a  7 period of -- as long as ten years?  8 <b>A. I have not.</b>  9 Q. Okay. Typically, what was the length of time  10 of the forecasts you have done previously?  11 <b>A. The forecasts were usually tied to the budget</b>  12 <b>cycle, determined by the legislature. You might go out</b>  13 <b>four to six years.</b>  14 Q. Okay. So, the standard forecast length that  15 Michigan used was four to six years?  16 <b>A. I would say it was four, in Michigan.</b>  17 Q. Okay. So, the generally accepted standard  18 length of a forecast in Michigan was four years?  19 <b>A. That was the forecast tied to the budget</b>  20 <b>cycle. You would do forecasts longer term for other</b>  21 <b>types of projects.</b>  22 Q. Okay. So, and the longest term forecast you  23 ever performed in the ordinary course of your work as a  24 forecaster was six years; is that correct?  25 <b>A. I might have done forecasts that went beyond</b></p>	<p style="text-align: right;">Page 12</p> <p>1 R. CLINE  2 <b>A. It was not.</b>  3 Q. When did you begin your work for Detroit?  4 <b>A. It would have been in the spring, I believe,</b>  5 <b>of 2013.</b>  6 Q. Your work in this case, you have prepared some  7 expert opinions for the confirmation hearing, correct?  8 <b>A. I have -- I don't understand the question.</b>  9 Q. Okay. Well, you know you filed an expert  10 report.  11 <b>A. Correct.</b>  12 Q. You know that, right?  13 <b>A. Correct.</b>  14 Q. And you're acting as an expert who is going to  15 testify at the confirmation hearing?  16 <b>A. I understand that, yes.</b>  17 Q. Okay. And I'm just wondering, other than your  18 work as an expert in the testimony you're going to give  19 at the confirmation hearing, have you done any other work  20 for the City of Detroit?  21 <b>A. If you could clarify that question. Are you</b>  22 <b>referring to all of the work I have done as an EY</b>  23 <b>employee for the City of Detroit?</b>  24 Q. Well, yes. Basically, what I'm trying to  25 figure out is I have a copy of your expert report, and</p>

Pages 9 to 12

1 R. CLINE  
 2 conducted on Detroit income tax, wagering tax, utility  
 3 users' tax or corporate tax, correct?  
 4 **A. I am aware of the forecasts the City of**  
**5 Detroit did for those tax sources.**  
 6 Q. Is that the forecast that you have done, or is  
 7 that a different forecast?  
 8 **A. That would be the forecast prepared as the**  
**9 normal budgetary cycle for the City of Detroit.**  
 10 Q. All right. Did you perform that, or did  
 11 somebody else perform that?  
 12 **A. It was done -- my understanding is it was done**  
**13 by the City.**  
 14 Q. And the City -- what time period do they use  
 15 as their standard period for forecasting?  
 16 **A. I believe they go out two years, might be**  
**17 three, but I believe it's a two-year forecast.**  
 18 Q. You're not aware of any forecast conducted for  
 19 the City of Detroit that's longer than three years,  
 20 correct?  
 21 **A. I'm not aware of any studies of forecasting**  
**22 tax revenues beyond that period of time.**  
 23 MR. STEWART: You mean by the City of  
 24 Detroit not for the City of Detroit, right,  
 25 Mr. Smith?

1 R. CLINE  
 2 MR. SMITH: No, I mean for.  
 3 BY MR. SMITH:  
 4 Q. You're not aware of any forecasts for the City  
 5 of Detroit going out more than three years, whether  
 6 conducted by the City or any other party, correct?  
 7 **A. I am not.**  
 8 MR. STEWART: Excluding his?  
 9 MR. SMITH: Yes. We're excluding his.  
 10 MR. STEWART: Yeah. That's what I figured.  
 11 That's why I raised it.  
 12 BY MR. SMITH:  
 13 Q. Your forecast is anomalous, correct, in terms  
 14 of the length of time that it goes out, correct?  
 15 MR. STEWART: Objection.  
 16 THE WITNESS: I don't know what you mean by  
 17 "anomalous."  
 18 BY MR. SMITH:  
 19 Q. It means there's no forecast like the one  
 20 you've conducted here that's ever been conducted for the  
 21 City of Detroit, correct?  
 22 **A. I did not say that.**  
 23 Q. Well, I'm asking you now. There's no forecast  
 24 like the one you've conducted for the City of Detroit --  
 25 **A. I don't --**

1 R. CLINE  
 2 Q. -- correct, that's ever been done?  
 3 **A. I don't know if that's correct.**  
 4 Q. Okay. Sitting here --  
 5 MR. STEWART: Do let him finish his  
 6 question before you answer, because you're making  
 7 his life harder, too.  
 8 BY MR. SMITH:  
 9 Q. Sitting here today, you can't identify any  
 10 forecasts using the type of methodology that you used for  
 11 the City of Detroit, correct?  
 12 **A. No, that's not correct.**  
 13 Q. What forecast has been done for the City  
 14 that's used the methodology you used?  
 15 **A. The methodology that we have used is a fairly**  
**16 standard forecasting methodology that's been used**  
**17 extensively in the City of Detroit and for the State of**  
**18 Michigan and in other cities.**  
 19 Q. Have you reviewed any depositions in this  
 20 case?  
 21 **A. I have not, other than my own.**  
 22 Q. The -- you say that the methodology used is a  
 23 standard methodology that's been used before, correct?  
 24 **A. The methodology we used in constructing the**  
**25 forecasting model is based upon my experience as a**

1 R. CLINE  
 2 **revenue forecaster, and I believe it is fairly standard**  
**3 in terms of how State revenue forecasting is done.**  
 4 Q. Can you point me to any treatise or other  
 5 publication that lays out the methodology you've used for  
 6 forecasting in this case?  
 7 **A. There are a number of publications, books, and**  
**8 articles that discuss revenue forecasting. I can't give**  
**9 you specific references today.**  
 10 Q. But is there any book or other written  
 11 publication that specifically lays out the specific  
 12 methodology that you've used in this case?  
 13 **A. The methodology that we used in this case is**  
**14 the methodology that I thought followed as a tax revenue**  
**15 estimator in both the State of Minnesota and the State of**  
**16 Michigan.**  
 17 Q. Okay. And you were doing forecasting for the  
 18 State, not cities, correct?  
 19 **A. Correct.**  
 20 Q. And you never used -- while you were at the  
 21 State of Minnesota or the State of Michigan, you never  
 22 forecast tax revenue out to 10 years, correct?  
 23 **A. I don't know if that's a correct statement.**  
 24 Q. Sitting here today, you can't identify any  
 25 instance when you were at either the State of Minnesota